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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA,  
SAN FRANCISCO DIVISION**

## **IN RE GOOGLE PLAY STORE ANTITRUST LITIGATION**

## This Document Relates To:

*Epic Games, Inc. v. Google LLC et al.*, Case No. 3:20-cv-05671-JD

*In re Google Play Consumer Antitrust Litigation*, Case No. 3:20-cv-05761-JD

*State of Utah et al. v. Google LLC et al.*, Case No. 3:21-cv-05227-JD

*Match Group, LLC et al. v. Google LLC et al.,*  
Case No. 3:22-cv-02746-JD

Case No. 3:21-md-02981-JD

**DECLARATION OF JONATHAN  
KRAVIS IN SUPPORT OF  
GOOGLE'S SUPPLEMENTAL  
BRIEF IN RESPONSE TO THE  
COURT'S FEBRUARY 27, 2023  
MINUTE ORDER**

Judge: Hon. James Donato

1                    **DECLARATION OF JONATHAN KRAVIS**

2                    I, Jonathan Kravis, declare as follows:

3                    1.         I am admitted pro hac vice in this case. I am a partner at the law firm of Munger,  
4 Tolles & Olson LLP and counsel of record for Google in the above-captioned matters. I have  
5 personal knowledge of the facts set forth in this declaration, except where stated that the facts are  
6 based on my understanding or belief. If called as a witness, I could and would testify  
7 competently to the matters set forth herein.

8                    2.         **Exhibit 1** is a true and correct copy of Slide 38 from Plaintiffs' Rule 37 Hearing  
9 Slides. This slide was presented to the Court at the January 31, 2023 hearing and provided to  
10 Google by counsel for Plaintiffs on February 1, 2023.

11                  3.         For each project identified in **Exhibit 1**, members of my team analyzed Plaintiffs'  
12 merits expert reports and Google deposition transcripts. Some projects encompass or are related  
13 to underlying programs (for example, Project Hug relates to both the Games Velocity Program  
14 and the Apps Velocity Program). **Exhibit 2** describes any sub-projects or programs that my team  
15 considered as part of each of the six projects for the purposes of this analysis.

16                  4.         **Exhibit 3** shows the results of an analysis conducted by my team to identify, for  
17 each of the projects identified by Plaintiffs in Exhibit A: (1) the number of times one of  
18 Plaintiffs' merits expert reports cited a Google document or Google deposition; (2) the number  
19 of unique documents cited by Plaintiffs' experts in their merits reports; (3) the number of Google  
20 witnesses questioned; and (4) the number of pages of deposition testimony by Google witnesses.

21                  5.         Twenty-five different Google witnesses were deposed on the six projects  
22 identified in Exhibit A and Plaintiffs elicited over 2,000 unique pages of testimony on these  
23 projects.

24                  6.         For the four projects that were internal assessments of possible changes to Google  
25 Play's business model (Projects Magical Bridge, Basecamp, Everest, and Runway), Plaintiffs  
26 elicited over 700 unique pages of deposition testimony and Plaintiffs' merits experts cited over  
27 fifty different documents across those four projects.

7. **Exhibit 4** is a true and correct copy of the document produced by Google in this litigation bearing the Bates range GOOG-PLAY-003332817.R to GOOG-PLAY-003332864.R.

8. **Exhibit 5** is a true and correct copy of the document produced by Google in this litigation bearing the Bates range GOOG-PLAY-004146689.R to GOOG-PLAY-004146757.R.

9. **Exhibit 6** is a true and correct copy of the document produced by Google in this litigation bearing the Bates range GOOG-PLAY-007424789 to GOOG-PLAY-007424790.

10. **Exhibit 7** is a true and correct copy of the document produced by Google in this litigation bearing the Bates range GOOG-PLAY-004702858 to GOOG-PLAY-004702862.

11. **Exhibit 8** is a true and correct copy of the document produced by Google in this litigation bearing the Bates range GOOG-PLAY5-000401049 to GOOG-PLAY5-000401050.

12. **Exhibit 9** is a true and correct copy of the document produced by Google in this litigation bearing the Bates range GOOG-PLAY5-000286391 to GOOG-PLAY5-000286393.

13. **Exhibit 10** is a true and correct copy of the document produced by Google in this litigation bearing the Bates range GOOG-PLAY5-000505705 to GOOG-PLAY5-000505707.

14. **Exhibit 11** is a true and correct copy of the document produced by Google in this litigation bearing the Bates range GOOG-PLAY5-000487184 to GOOG-PLAY5-000487185.

15. **Exhibit 12** is a true and correct copy of the document produced by Google in this litigation bearing the Bates number GOOG-PLAY5-000512579.

16. **Exhibit 13** is a true and correct copy of the document produced by Google in this litigation bearing the Bates range GOOG-PLAY5-000161588 to GOOG-PLAY5-000161589.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on this 14th day of March, 2023, in Washington, D.C.

Jonathan Kravits